

Ford Motor Company

NVS-212

2008 DEC 19 P 12:00

Automotive Safety Office
Environmental and Safety Engineering

December 18, 2008

Ms. Kathleen C. DeMeter, Director
Office of Defects Investigation Safety Assurance
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E. W45-302
Washington, D.C. 20590

Dear Ms. DeMeter:

Subject: PE08-063:NVS-212pco

As agreed in a December 1, 2008, telephone discussion with Mr. Peter Ong of the agency, Ford Motor Company (Ford) is submitting responses to certain of the subject information request questions prior to the requested due date in the agency's November 6, 2008, letter concerning reports of alleged improper operation of the compressed natural gas (CNG) fuel regulator in 2003-2004 model year dual fuel capable F150 vehicles and all other F150 vehicles equipped with the same subject component. The remainder of our response will be submitted by January 9, 2009. Accordingly, Ford's response to Request Numbers one through seven is attached.

If you have any questions concerning this response, please feel free to contact me.

Sincerely,



R. A. Nevi

Attachment



FORD MOTOR COMPANY (FORD) RESPONSE TO PE08-063

Ford's response to this Preliminary Evaluation information request was prepared pursuant to a diligent search for the information requested. While we have employed our best efforts to provide responsive information, the breadth of the agency's request and the requirement that information be provided on an expedited basis make this a difficult task. We nevertheless have made substantial effort to provide thorough and accurate information, and we would be pleased to meet with agency personnel to discuss any aspect of this Preliminary Evaluation.

The scope of Ford's investigation conducted to locate responsive information focused on Ford employees most likely to be knowledgeable about the subject matter of this inquiry and on review of Ford files in which responsive information ordinarily would be expected to be found and to which Ford ordinarily would refer. Ford notes that although electronic information was included within the scope of its search, Ford has not attempted to retrieve from computer storage electronic files that were overwritten or deleted. As the agency is aware, such files generally are unavailable to the computer user even if they still exist and are retrievable through expert means. To the extent that the agency's definition of Ford includes suppliers, contractors and affiliated enterprises for which Ford does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in Ford's possession, custody or control.

Ford has construed this request as pertaining to vehicles manufactured for sale in the United States, its protectorates and territories. Also, in the agency's information request, the subject vehicles were defined as "all MY 2003-2004 dual fuel capable F-150 Series vehicles and all other MY F-150 Series vehicles equipped with the same subject component." Accordingly, Ford's response includes information pertaining to 1998-2004 model year dual fuel capable F-150 vehicles with the subject component.

Ford notes that some of the information being produced pursuant to this inquiry may contain personal information such as customer names, addresses, telephone numbers, and complete Vehicle Identification Numbers (VINs). Ford is producing such personal information in an unredacted form to facilitate the agency's investigation with the understanding that the agency will not make such personal information available to the public under FOIA Exemption 6, 5 U.S.C. 552(b)(6).

Answers to your specific questions are set forth below. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, Ford has undertaken to provide responsive documents dated up to and including November 6, 2008, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environmental and Safety Engineering, Ford Customer Service Division, Marketing and Sales Operations, Global Core Engineering, Office of the General Counsel, and North American Truck Product Development.

Request 1

State within the body of the response letter a summary, by model and model year, the number of subject vehicles Ford has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture (in "yyyy/mm/dd" date format);
- f. Date warranty coverage commenced (in "yyyy/mm/dd" date format); and
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

Answer

Ford records indicate that approximately 6,749 1998-2004 model year dual fuel capable F-150 vehicles originally built with the subject component were sold in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands).

The number of subject vehicles sold in the United States by model and model year is shown below:

Model	1998 MY	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY	2004 MY
F-150	746	615	1,447	1,894	727	911	409

The requested data for each subject vehicle is provided electronically in Appendix A on the enclosed CD.

Request 2

State within the body of the response letter, the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a fire, crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims; and
- e. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and Ford's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Answer

For purposes of identifying reports of incidents that may be related to the alleged defect and any related documents, Ford has gathered "owner reports" and "field reports" maintained by Ford Customer Service Division (FCSD), and claim and lawsuit information maintained by Ford's Office of the General Counsel (OGC).

Descriptions of the FCSD owner and field report systems, and the criteria used to search each of these are provided electronically in Appendix B on the enclosed CD.

The following categorizations were used in the review of reports located in each of these searches:

Category	Allegation
A	Alleged natural gas odor or leak due to the subject component
B	Reports that are ambiguous whether they relate to the subject component or alleged defect

We are providing electronic copies of reports categorized as "B" as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these reports is insufficient to support a determination that they pertain to the alleged defect.

Owner Reports: Records identified in a search of the Master Owner Relations Systems (MORS) database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described above. The number and copies of relevant owner reports identified in this search that may relate to the agency's investigation are provided in the MORS III portion of the electronic database contained in Appendix C on the enclosed CD. The categorization of each report is identified in the "Category" field.

Legal Contacts: Ford is providing, in Appendix B, a description of Legal Contacts and the activity that is responsible for this information, OGC. Ford notes that no Legal Contacts that may relate to the agency's investigation were identified.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described above. The number and copies of relevant field reports identified in this search that may relate to the agency's investigation are provided in the CQIS portion of the electronic database contained in Appendix C on the enclosed CD. The categorization of each report is identified in the "Category" field. Field reports that are duplicative of owner reports are provided in Appendix C but are not included in the field report count.

VOQ Data: This information request had an attachment that included four Vehicle Owner's Questionnaires (VOQs), none of which were duplicative. Ford made inquiries of its MORS

database for customer contacts, and its CQIS database for field reports regarding the vehicles identified on the VOQs. Four reports located on vehicles identified in the VOQs related to the alleged defect are included in the CQIS portion of the electronic database provided in Appendix C and have been identified by a "Y" in the "VOQ Dup" field.

Fire/Crash/Injury Incident Claims: For purposes of identifying allegations of fires, accidents, or injuries that may have resulted from the alleged defect, Ford has reviewed responsive owner and field reports, and lawsuits and claims. Ford did not identify any reports of fires, crashes or injuries that are alleged to be related to this subject. Ford identified one allegation of an engine compartment fire that is ambiguous regarding whether it is related to either the subject component or the alleged defect. There is no specific allegation contained in the available information regarding the source of the alleged engine compartment fire. Available information also indicates that this incident was originally reported as an accident, and that it was not reported to Ford until over two months after the alleged incident occurred.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the alleged defect, Ford has searched claim and lawsuit information maintained by Ford's OGC. Ford's OGC is responsible for handling product liability lawsuits, claims, and consumer breach of warranty lawsuits and arbitrations against the Company. Ford notes that no claims or lawsuits that may relate to the agency's investigation were identified.

Request 3

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Ford's file number or other identifier used;
- b. The category of the item, as identified in Request No, 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date (in "yyyy/mm/dd" date format);
- h. Report or claim date (in "yyyy/mm/dd" date format);
- i. Whether a fire or crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Answer

Ford is providing owner and field reports in the electronic database contained in Appendix C on the enclosed CD in response to Request 2. To the extent information sought in Request 3 is available for owner and field reports, it is provided in the database.

Request 4

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents.

Answer

Ford is providing owner and field reports in the electronic database contained in Appendix C on the enclosed CD in response to Request 2. To the extent information sought in Request 4 is available, it is provided in the database.

Request 5

State within the body of the response letter a summary, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Ford to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following reformation:

- a. Ford's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date in "yyyy/mm/dd" date format);
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described in the response to Request 2. The number and copies of relevant warranty claims identified in this search that may relate to the agency's investigation are provided in the AWS portion of the electronic database contained in Appendix C on the enclosed CD. The categorization of each report is identified in the "Category" field.

When we were able to identify that duplicate claims for an alleged incident were received, each of these duplicate claims was marked accordingly and the group counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one claim associated with their VINs. These claims have been counted separately. Warranty claims that are duplicative of owner and field reports are provided in Appendix C but are not included in the report count above.

Requests for "goodwill, field or zone adjustments" received by Ford to date that may relate to the alleged defect that were not honored, if any, would be included in the MORS reports identified above in response to Request 2. Such claims that were honored are included in the warranty data provided.

Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Ford on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Ford offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Answer

Detailed descriptions of the search criteria, including all pertinent parameters, used to identify the claims provided in response to Request 5 are described in Appendix B.

For 1998-2004 model year dual fuel CNG capable F-150 vehicles, the New Vehicle Limited Warranty, Bumper-to-Bumper Coverage begins at the warranty start date and lasts for three years or 36,000 miles, whichever occurs first. For vehicles certified to comply with California emissions requirements and sold in California, Maine, Massachusetts, New York or Vermont, the CNG fuel regulator is covered under warranty for a period of 7 years or 70,000 miles, whichever occurs first. Optional Extended Service Plans (ESPs) were available to cover various vehicle systems, time in service and mileage increments. The details of the various plans are provided electronically in Appendix D on the enclosed CD. As of the date of the information request, 509 ESP policies had been purchased for 1998-2004 model year dual fuel CNG capable F-150 vehicles.

Request 7

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Ford has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Ford is planning to issue within the next 120 days.

Answer

For purposes of identifying communications to dealers, zone offices, or field offices pertaining, at least in part, to improper operation of the CNG fuel regulator, Ford has reviewed the following FCSD databases and files: The On-Line Automotive Service Information System (OASIS) containing Technical Service Bulletins (TSBs) and Special Service Messages (SSMs); Internal Service Messages (ISMs) contained in CQIS; and Field Review Committee (FRC) files. We assume this request does not seek information related to electronic communications between Ford and its dealers regarding the order, delivery, or payment for replacement parts, so we have not included these kinds of information in our response.

A description of Ford's OASIS messages, ISMs, and the Field Review Committee files and the search criteria used are provided in Appendix B.

OASIS Messages: Ford identified one SSM that describes the automatic bi-fuel switch-over process from CNG to gasoline in the subject vehicles and is providing a copy in Appendix E on the enclosed CD. Ford has identified no TSBs that may relate to the alleged defect in the subject vehicles.

Internal Service Messages: Ford has identified no ISMs that may relate to the alleged defect in the subject vehicles.

Field Review Committee: Ford has identified no field service action communications that may relate to the alleged defect in the subject vehicles.